



Department of Energy
Richland Operations Office
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DEC 16 2005

06-AMCP-0074

Mr. A. W. Conklin, Supervisor
Air Emissions and Defense Waste Section
Washington State Department of Health
P.O. Box 47827
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DEC 22 2005

EDMC

Mr. O. S. Wang
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Addressees:

TRANSITION OF THE 241-Z LIQUID WASTE TREATMENT FACILITY TO REGULATION
UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION,
AND LIABILITY ACT

This letter is provided to the Washington State Department of Health with copy to the U.S. Environmental Protection Agency to document the transition of the 241-Z Liquid Waste Treatment Facility (241-Z Building) at the Plutonium Finishing Plant and associated 296-Z-003 emission unit as identified in WDOH approval letter AIR 03-1109, dated November 21, 2003, to regulation under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) authority approved in May 2005 via DOE/RL-2005-13, Revision 0, "Action Memorandum for the Plutonium Finishing Plant Above-Grade Structures Non-Time Critical Removal Action" and DOE/RL-2005-14, Revision 0, "Removal Action Work Plan for the Plutonium Finishing Plant Above-Grade Structures: Facility Deactivation". All the substantive requirements from the facility's permit/license conditions and limitations have been incorporated into the above cited CERCLA implementation documentation.

This letter is also provided to the State of Washington, Department of Ecology to provide notice to remove the conditions and limitations associated with the Notice of Construction approval AIR 03-1109 from the Hanford Site Air Operating Permit (#00-05-006) for the 296-Z-003 emission unit.

NOC Application/Permit Revision

NOTE: Any increase to abated or unabated PTE requires a full NOC modification

REASON FOR CHANGE

Submittal Date: 12/05/05

Submittal Type:

☐ NOC Application Revision

☐ Condition Change/ Clarification

WDOH Condition Number:

AOP Condition Number:

☐ ALARACT Revision

☐ Report of Closure

New ALARACT Rev Number:

☒ CERCLA Transition

PROJECT IDENTIFICATION

Project Title: CERCLA Transition for 241-Z Building Activities

Current NOC Application Number: DOE/RL-2002-72, Revision 0

AEI ID Number (AOP Emission Unit Number(s)): 386

Current WDOH Approval Letter Number(s): AIR-03-1109

WDOH NOC ID Number: 563

Current EPA Approval Letter, dated June 26, 2003, D. Opalski (EPA) to K. Klein (RL),
Letter Number(s) no title.

DOE RL CERCLA
Documents

DOE/RL-2005-13, *Action Memorandum for the Plutonium Finishing Plant Above-Grade Structures Non-Time Critical Removal Action*,
Revision 0, approved May 2005.

DOE/RL-2005-14, *Removal Action Work Plan for the Plutonium Finishing Plant Above-Grade Structures: Facility Deactivation*,
Revision 0, approved May, 2005.

DOE/RL-2005-15, *Removal Action Work Plan for the Plutonium Finishing Plant Above-Grade Structures: Ancillary Facility Demolition*,
Revision 0, approved May, 2005.

241-Z Liquid Waste Treatment Facility (241-Z Building) at the Plutonium Finishing Plant

This transmittal to the State of Washington Department of Health (WDOH) with copy to the U.S. Environmental Protection Agency (EPA) is to document the transition of the 241-Z Liquid Waste Treatment Facility (241-Z Building) at the Plutonium Finishing Plant and associated 296-Z-003 emission unit as identified in WDOH approval (AIR-03-1109, NOC ID 563) to regulation under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) authority approved in May 2005, and implemented in June 2005. The aforementioned approval addresses the Emission Unit I.D. 386, National Emissions Standards for Hazardous Air Pollutants [NESHAPS] major stack as addressed in WDOH NOC ID Number 563: The NOC ID Number 563 also addresses the 241-Z Building emissions as contributing to the 200 Area Diffuse/Fugitive Emissions (General Emission Unit, I.D. 486); and possible use in the 241-Z Building of Portable Temporary Radioactive Air Emission Units (Emission Unit I.D. 747)

This transmittal also is provided to the State of Washington, Department of Ecology (Ecology) recommending removal of the conditions and limitations associated with the Notice of Construction approval (AIR-03-1109) from the Hanford Site Air Operating Permit #00-05-006, or its renewal, as applicable.

Approvals for alternate monitoring were received from WDOH (AIR-03-1109) and EPA [letter, dated June 26, 2003, D. Opalski (EPA) to K. Klein (RL), no title]. The emission measurements would continue under CERCLA regulation to be based on use of the existing sampling system [as described for alternative stack flow measurement and sample extraction procedure for the 296-Z-3 stack (03-RCA-0239)] until either air emissions from the stack are terminated or the potential for emissions from the stack can be confirmed as representing a minor source (i.e., providing a potential for <0.1 mrem/yr EDE to the MEI).

In accordance with 40 CFR 300.400(e)(1), federal, state, or local permits are not required for onsite response actions conducted pursuant to CERCLA sections 104, 106, 120, 121, or 122. Activities associated with the 241-Z Building will be subject to substantive provisions of air emission standards as identified through application of 40 CFR 300.400(g), with oversight provided pursuant to the Tri-Party Agreement.

Based on this CERCLA transition, the 241-Z Building and associated emissions should be deregistered with WDOH, the NOC approval AIR 03-1109 (NOC ID 563) obsoleted, and the EPA approval of June 26, 2003, obsoleted. In addition, the Emission Unit 386, and any association of the 241-Z Building with Emission Units 486 or 747, should be removed from the Hanford Site Air Operating Permit (AOP Permit 00-05-006/ License Number FF-01) by Ecology.

Addressees
06-AMCP-0074

-2-

DEC 16 2005

If there are any questions regarding this matter, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein
Manager

AMCP:WCW

Enclosure

cc w/encl:

R. W. Bloom, FHI
G. Bohnce, NPT
F. W. Bond, Ecology
N. Ceto, EPA
L. D. Crass, FHI
L. J. Cusack, Ecology
L. L. Fritz, FHI
S. Harris, CTUIR
D. W. Hendrickson, Ecology
N. A. Homan, FHI
M. T. Jansky, FHI
R. Jim, YN
G. A. Johnston, FFS
T. M. Martin, HAB
K. Niles, ODOE
R. W. Oldham, FHI
J. Schmidt, WDOH
M. A. Wilson, Ecology
D. Zhen, EPA, Region 10
Administrative Record (file: 241-Z/Emission
Units 386, 486, and 747)
Environmental Portal